



DESAUTEL LAW

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January 18, 2022

VIA ELECTRONIC MAIL & USPS

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 5189 – The Narragansett Electric Company d/b/a National Grid Annual Energy Efficiency Plan for 2022

Dear Ms. Massaro:

This office represents the Rhode Island Energy Efficiency Resource Management Council (“EERMC”) in the above docket. On January 14, 2022, National Grid (the “Company”) filed with the Public Utilities Commission (“PUC”) a memo titled “RE: Docket 5189 – 2022 Annual Energy Efficiency Program Plan National Grid’s Requested Approvals.” As a party to the above-referenced docket, the EERMC submits the following comments in response to the Company’s January 14th filing.

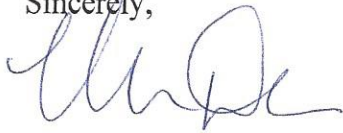
In its list of items for which the Company seeks approval from the PUC, item (1)b seeks to replace the proposed performance incentive earning opportunity of \$7.2 million with the \$4.3 million earnings opportunity as described in the Division of Public Utilities and Carriers (“DPUC”) memorandum entitled “RE: Determining Target Incentives for EE PIM.” Item (1)a proposes to adopt the Alternative Base Plan based on the budget and savings proposed in the Company’s response to PUC 7-9. In that response, however, the performance incentive earning opportunity for the electric portfolio is listed as \$5.5 million in all tables where it is referenced, which does not align with the approximately \$3.4 million indicated for the electric portfolio in item (1)b of the request. Consequently, the BCRs listed in Table E-5-Primary, E-5-Secondary, and E-5A of the Company’s response to PUC 7-9 appear to be inaccurate. To ensure that the record accurately reflects these changes, the EERMC respectfully requests that the Company provide updated versions of all electric and gas tables (Attachments 5 and 6, respectively).

The EERMC also respectfully requests that the Company provide an updated version of the 2022 Annual Energy Efficiency Plan narrative that accounts for the revisions to Section 10.4 as noted in item (7) in the aforementioned memo filed with the PUC on January 14th.

Addressing these requests will ensure that the requested approvals are all internally consistent, and that a definitive reference is available.

Please be advised that an electronic copy of this document has been sent to the Service List. Thank you for your attention to this matter.

Sincerely,



Marisa A. Desautel, Esq.

cc: Docket 5189 Service List